

From: Julianna P. Parks <jparks@jpkrlaw.com>

Sent: Wednesday, November 13, 2019 10:27 AM

To: Davis Powell <dpowell@davidsonsummers.com>

Subject: Re: Magnolia Island Plantation, LLC et al v. Lucky Family LLC et al - 5:18-cv-1526

Davis,

I am at the Sheriff's office and I just spoke with Kim Flournoy about the topics listed. She doesn't know anything or remember anything and her answer is going to be she did what supervisor Jean Horne told her. Therefore, in the interest of efficiency I believe you will have better luck going straight to Jean Horne. Ms. Horne is available any time next week (but not tomorrow) to answer questions regarding the topics listed in your notice. Although she may not remember the details she is the person with most knowledge of the areas in your letter.

Thanks, Julianna

Sent from my iPhone

On Nov 13, 2019, at 8:17 AM, Davis Powell <dpowell@davidsonsummers.com> wrote:

To All:

Counsel for the Sheriff has agreed to Plaintiffs' request to depose Kim Flournoy of the Bossier Parish Sheriff's Office to ensure coverage of the topics we presented on our 30b6 Notice. Mrs. Flournoy is available this Friday (11/15) and the following Monday (11/18). She was also available Thursday morning but I do not think we can get both her and Mrs. Lucky completed before Sheriff's counsel has to leave. My preference would be to try for sometime Friday but I can be available on either day. For now, I am proposing Friday at 11am. Please confirm what will work best for you and I will provide a Notice of Deposition.

-Davis